



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

February 28, 2023

BY ECF

Hon. Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

**Re: *United States v. Joshua Adam Schulte,*
 S3 17 Cr. 548 (JMF)**

Dear Judge Furman:

The Government writes to respectfully request an extension of its time to respond to the defendant's *pro se* post-trial motions pursuant to Rules 29 and 33 of the Federal Rules of Criminal Procedure (the "Motion") (D.E. 992). The defendant filed his 112-page Motion on January 12, 2023. In response to the Government's motion to strike the overlarge motion or, in the alternative, for an enlargement of the Government's page limitations and extension of its response time to April 6, 2023, the Court ordered that the Government's opposition be filed by March 2, 2023, with a limit of 80 pages.

The Government respectfully requests an extension until March 16, 2023, to file the opposition. One of the assigned Assistant United States Attorneys responsible for this matter has been on trial in the Eastern District of New York in the matter of the *United States v. Tahlil Mohamed and Abdi Yusuf Hassan*, 18 Cr. 603 (E.D.N.Y.), which commenced on February 6, 2023, and concluded on February 24, 2023; and is now on military leave for the next several weeks. While the Government has made use of the current filing extension, in light of the diminished resources of the trial team and the length of the Motion, the Government respectfully requests a further extension of the filing deadline. The requested extension until March 16, 2023, also reflects that the other assigned Assistant United States Attorney will be on work-related international travel

next week. Should this request be granted, the Government would not object to a corresponding extension of the defendant's present March 30, 2023 deadline to file his reply.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/
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cc: Defense counsel (by ECF)
Joshua Adam Schulte (by U.S. Mail)